

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

BANCO POPULAR DE PUERTO RICO ET ALS.,	*	<b>CV. 01-1142 (GAG)</b>
PLAINTIFF,	*	
V.	*	
LAMCO/ACEMLA, ET ALS.,	*	
DEFENDANT.	*	

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LAMCO/ACEMLA ET ALS.,	*	<b>CV. 01-1461 (GAG)</b>
	*	
PLAINTIFF,	*	
	*	
V.	*	
	*	
BANCO POPULAR DE PUERTO RICO, ET ALS.,	*	
	*	
DEFENDANT.	*	

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**MOTION FOR ENLARGEMENT OF TIME FILED ON CONSENT**

**TO THE HONORBLE COURT:**

**COMES NOW** defendant/plaintiff, LAMCO/ACEMLA, ET ALS., through the undersigned attorney of record and respectfully states, alleges and prays the following Motion filed upon Consent of Universal party:

1. On November 11, 2009, Universal filed its Post-Trial Brief after receiving an extension of time to do so. See Motion to Enlarge at Dk. 449 and Order granting same at Dk. 451. This Motion seeks a short three (3) working day enlargement until November 24, 2009 to file its reply-Brief for good cause shown herein. This Motion is filed on consent of Attorney Edgardo Colon for the Universal party.

2. The Bench Trial was held on October 16, 2009 and the Minutes state that the Brief that this Honorable Court issued an Order that Universal shall file its brief one week after the transcript is produced. The Minutes also ordered that the reply be filed by LAMCO, one week later. See Dk. 429.

3. The transcripts expedited and were available on October 19, 2009. On October 22, 2009, this Honorable Court issued an Order, sua sponte, and extended the time to file Trial Brief until November 6, 2009. See Dk. 432. After the additional requested and granted extension, (Dk. 449) that was also filed on consent, in all, Universal had over three (3) weeks (23 days) to prepare its Trial Brief which raises issues beyond the law of the case.

4. The undersigned attorney since Wednesday, a federal holiday, had two 12 hour extended days of depositions and preparation, November 13-14 (14<sup>th</sup>-Saturday) and had its San Juan LAMCO office without any electricity for three (3) days, the same having been restored and the same open only yesterday. This last unforeseen circumstance did not help and in-part prevented the completion of the Brief and additional time is needed to adequately answer the issues raised therein.

**WHEREFORE**, plaintiff respectfully requests that this Honorable Court grant it's three (3) working day enlargement until November 24, 2009 for good cause shown herein.

**RESPECTFULLY SUBMITTED:**

**CERTIFICATE OF SERVICE:** I HEREBY CERTIFY that a true and exact copy of the foregoing document has been filed with the Clerk of Court using the

CM\_ECF system that will served notice to Attorney Edgardo Colon and all defendant's counsel and to all of the parties counsel at their address of record herein.

In Ponce, Puerto Rico, this 18th day of November, 2009.

/s Mauricio Hernandez Arroyo

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**LAW OFFICES OF  
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